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**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

UNITED STATES OF AMERICA,

Plaintiff,

v.

RALUCA MERISOREANU,

MIHAI IANCU,

IONUT CHRISTIAN ROSCULET, and

VIOREL BUSUIOC,

Defendants.

Case No. 2:04-cr-177-GMN-NJK

**Motion to Dismiss the Second
Superseding Indictment as to the
Remaining Defendants**

On May 11, 2004, a federal grand jury returned an Indictment charging 13 defendants, including Raluca Merisoreanu, Mihai Iancu, Ionut Christian Rosculet, and Viorel Busuioc (collectively, the “Remaining Defendants”), with charges related to access device fraud based on conduct occurring between January 2000 and March 2004. (ECF 1.) The next day, the Court issued warrants for the arrest of these 13 defendants. (ECF 16-28.) On July 27, 2004, a federal grand jury returned a superseding indictment against the same 13 defendants (ECF 83), with the Court issuing arrest warrants the next day (ECF 84-96). Finally, on September 21, 2010, after the conviction of seven defendants, a federal grand

1 jury returned a second superseding indictment against the Remaining Defendants (as well
2 as two other defendants who were both later convicted). (ECF 267.) More than 17 years
3 after the original indictment, the Remaining Defendants have yet to make an appearance in
4 this District on the charges against them.

5 Pursuant to Federal Rule of Criminal Procedure 48(a), the Government now
6 requests permission of the Court to dismiss the Indictment as to the Remaining
7 Defendants. If granted, because the Remaining Defendants would no longer face any
8 charges in this case, the Government further requests that the Court quash the outstanding
9 warrants for their arrest issued on July 28, 2004.

10 Respectfully submitted this 9th day of July, 2021.

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12 Acting United States Attorney

13 s/ Richard Anthony Lopez
14 RICHARD ANTHONY LOPEZ
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1 **UNITED STATES DISTRICT COURT**
2 **DISTRICT OF NEVADA**

3 UNITED STATES OF AMERICA,

4 Plaintiff,

5 v.

6 RALUCA MERISOREANU et al.,

7 Defendants.
8

Case No. 2:04-cr-177-GMN-NJK

**[Proposed] Order Granting
Motion to Dismiss the Indictment
as to Remaining Defendants**

9 Pursuant to Federal Rule of Criminal Procedure 48(a), and upon leave of Court, the
10 United States hereby dismisses the Indictment against Defendants Raluca Merisoreanu,
11 Mihai Iancu, Ionut Christian Rosculet, and Viorel Busuioc.

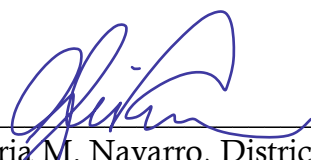
12 CHRISTOPHER CHIOU
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14 s/Richard Anthony Lopez
15 RICHARD ANTHONY LOPEZ
16 Assistant United States Attorney

17 Leave of Court is granted for the filing of the above dismissal. Because the
18 Indictment has been dismissed as to Defendants Raluca Merisoreanu, Mihai Iancu, Ionut
19 Christian Rosculet, and Viorel Busuioc, it is hereby ordered that the warrants for their
20 arrest, issued July 28, 2004, are quashed.

21 **IT IS SO ORDERED.**

22 Dated this 12 day of July, 2021

23 
24 Gloria M. Navarro, District Judge
UNITED STATES DISTRICT COURT